UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

IN RE: AVANDIA MARKETING SALES PRACTICES AND PRODUCTS IABILITY

: MDL NO.: 1871 : 07-MD-01871-CMR

LITIGATION

: HONORABLE CYNTHIA M. RUFE

THIS DOCUMENT APPLIES TO ALL ACTIONS

APPLICATION OF VICTORIA J. MANIATIS FOR APPOINTMENT TO PLAINTIFFS' STEERING COMMITTEE

Pursuant to Case Management Order No. 103, I, Victoria J. Maniatis, respectfully submit this Application for Appointment to the Avandia Marketing, Sales Practices and Products Liability Litigation Plaintiffs' Steering Committee.

PROFESSIONAL EXPERIENCE

I am a senior associate at Milberg LLP, where I practice exclusively in our firm's pharmaceutical and medical device division. While I spent my first five years of practice as a defense attorney, my last twelve years of practice have been dedicated to plaintiffs' mass tort cases, primarily pharmaceutical and medical device cases. During those years I have become very familiar with Mass Torts practice, practitioners and the Manual for Multi-District Litigation. Over the last nine years I have performed common benefit work with several Plaintiffs' steering committees in both state and federal courts including Baycol, Accutane, Ortho Evra, ReNu Contact Lens Solution, and for the last three years Avandia.

In June of 2007, I began working on behalf of Avandia clients with the Avandia PSC for my prior firm and have continued that work with Milberg. My last firm, Morelli Ratner, is a

member of the Avandia PSC and there I attended to a variety of functions including case specific work up, discovery and science committee work, as well as document review. For example, I was the principle PFS coordinator, spearheading drafting and negotiating efforts resulting in the final PFS ultimately approved by Your Honor. Once joining Milberg LLP, I continued to work closely with the PSC, further contributing my time by performing considerable document review and assisting the science and sales and marketing committees, as well as helping to develop expert witnesses.

Accordingly, as I have worked with a PSC firm at the inception of the MDL and have continued performing common benefit work with Milberg, I am capable of making a smooth transition into a PSC position, continuing the work I have already been doing for the last three years.

ABILITY AND AVAILABILITY

Over the years my peers have acknowledged my dedication to pharmaceutical mass torts by inviting me to be both a moderator and presenter at numerous AAJ, Mealey's, Harris-Martin and Mass Torts Made Perfect seminars on litigations including Avandia, Baycol, Ortho Evra and ReNu. Having practiced as a defense attorney and a plaintiffs' attorney in many courts across the country I take pride in my ability to fully evaluate and professionally address the nuances of a case and work well with plaintiff and defense counsel alike.

My firm, Milberg LLP has been a leader in representing injured plaintiffs in many courts participating on several pharmaceutical PSC's, including Kugel, Zyprexa and Bextra.

Accordingly, our firm is experienced, well-staffed and financially capable of participating as a PSC firm and representing the interests of the plaintiffs in this MDL. We are fully invested in this litigation representing over 150 plaintiffs in this Court as well as pursuant to tolling

agreements. We have been involved in the Avandia litigation from its infancy and look forward to continuing our work in a PSC-firm capacity.

Wherefore, I respectfully request that Your Honor grant my request to participate in this litigation as a member of the Plaintiffs' Steering Committee.

Please let me know if you need any further information or have any questions regarding my application.

Dated: July 15, 2010

Respectfully

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CERTIFICATE OF SERVICE

I, Victoria J. Maniatis, Esquire, hereby certify that the attached document was filed through the court's CM/ECF system and that a copy of the attached document is being served upon all counsel of record through the ECF system.

MILBERG DLP

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